

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

**YOEL WEISSHAUS,**

*Plaintiff,*

v.

**STEVE COY TEICHELMAN, and  
100<sup>th</sup> JUDICIAL DISTRICT,**

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 2:22-cv-00035-z**

**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY  
JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff files this Response to Defendant's Motion for Summary Judgement. (ECF 27). A brief that sets forth the arguments and authorities on which Plaintiff relies in support of the Response is filed separately. Defendant's motion should be denied as there are genuine disputes of material fact concerning (1) whether Defendant had probable cause or reasonable suspicion to support detaining Mr. Weisshaus after the purposes of the traffic stop had concluded as Mr. Weisshaus was not suspected of committing a crime and was not in the process of committing a crime when he was instructed not to leave and (2) whether an illegal search of Plaintiff's vehicle was conducted as Defendant had no probable cause, warrant, exception to the warrant requirement, nor consent. For the reasons and arguments set forth in the accompanying brief, Plaintiff respectfully requests this Court deny Defendant's Motion for Summary Judgement (ECF 27) and for such other and further relief to which he may be entitled, general or special, at law or in equity.

Respectfully submitted,

/s/ Breanta Boss

BREANTA BOSS

Texas Bar No. 24115768  
SCOTT H. PALMER  
Texas Bar No. 00797196

JAMES P. ROBERTS  
Texas Bar No. 24105721

SCOTT H. PALMER, P.C.  
15455 Dallas Parkway,  
Suite 540, LB 32  
Dallas, Texas 75001  
Tel: (214) 987-4100  
Fax: (214) 922-9900  
scott@scottpalmerlaw.com  
james@scottpalmerlaw.com  
breanta@scottpalmerlaw.com

ATTORNEYS FOR THE PLAINTIFF

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was forwarded to all counsel of record, in a manner authorized by Rule 5, of the Federal Rules of Civil Procedure, on October 19, 2022.

/s/ Breanta Boss  
BREANTA BOSS